

1 Stacey M. Leyton (SBN 203827)
2 Barbara J. Chisholm (SBN 224656)
3 Danielle Leonard (SBN 218201)
4 ALTSHULER BERZON LLP
5 177 Post Street, Suite 300
6 San Francisco, CA 94108
7 Tel. (415) 421-7151
8 Fax (415) 362-8064
9 sleyton@altber.com
10 dleonard@altber.com
11 bchisholm@altber.com

12 Elena Goldstein (pro hac vice)
13 Skye Perryman (pro hac vice)
14 DEMOCRACY FORWARD FOUNDATION
15 P.O. Box 34553
16 Washington, DC 20043
17 Tel: (202) 448-9090
18 Fax: (202) 796-4426
19 egoldstein@democracyforward.org
20 sperryman@democracyforward.org

21 *Attorneys for Plaintiffs*

22 [Additional Counsel not listed]

23 UNITED STATES DISTRICT COURT
24 FOR THE NORTHERN DISTRICT OF CALIFORNIA
25 SAN FRANCISCO DIVISION

26 AMERICAN FEDERATION OF
27 GOVERNMENT EMPLOYEES, AFL-CIO, et
28 al.,

29 Plaintiffs,

30 v.
31 DONALD J. TRUMP, in his official capacity
32 as President of the United States, et al.,

33 Defendants.

34 Case No. 3:25-cv-03698-SI

35 **DECLARATION OF MARK COCHRAN**

1 **DECLARATION OF MARK DIETRICH COCHRAN**

2 I, Mark Dietrich Cochran, declare as follows:

3 1. I am over 18 years of age and competent to give this declaration. This declaration is
4 based on my personal knowledge, information, and belief.

5 2. I am employed by the U.S. National Park Service (“NPS”), which is an agency of
6 the U.S. Department of Interior for 10 years since around 2015. I am also the President of
7 American Federation of Government Employees (“AFGE”) Local 3145 (“Local 3145” or the
8 “Union”) for four years. I am also the Council 270 President, which represents approximately
9 1,000 federal employees in the NPS in the Northeast Region from New York to Virginia. Council
10 270 has approximately 400 active dues paying members.

11 3. I am currently employed as a Tractor Operator at the Gettysburg National Military
12 Park, which is operated by the NPS. In my role as a Tractor Operator, my primary responsibility
13 is to preserve the landscape by mowing, doing the tree work, repairing park signs, maintaining
14 park trails, or performing anything needed for the park, except for work on the structures or
15 monuments.

16 4. Local 3145 represents a bargaining unit of around 120 employees at peak season
17 (with 60 current full-time employees) at Gettysburg National Military Park and Eisenhower
18 National Historic Site, which are both located in Gettysburg, Pennsylvania. These employees
19 include interpretative rangers, maintenance workers, and administrative folks. These bargaining
20 unit ensure both the Military Park and Historic Site operational for members of the public to
21 enjoy.

22 5. Council 270 consists of six AFGE locals, Locals 407, 1647, 2058, 3034, 3145, and
23 3432, which cover NPS employees at approximately 50 National Parks, Military Parks, Historical
24 Parks, Monuments, Historic Sites, Battlefields and a Seashore, including for example Shenandoah
25 National Park, New River Gorge National Park and Preservc, Independence National Historic
26 Park, Vanderbilt Mansion National Historic Site, Statute of Liberty National Monument, Fire
27

1 Island National Seashore. Council 270 collectively bargains with NPS on behalf of the employees
2 in the six locals to obtain a fair collective bargaining agreement (“CBA”).

3 6. Local 3145’s mission is to support the members in the bargaining unit by helping
4 them be successful in their employment and protecting their employment rights. As the exclusive
5 bargaining representative of these workers, the Union provides many services to all bargaining
6 unit members. Local 3145 files grievances against the NPS to enforce the CBA. As Local 3145
7 President, I mediate disputes between workers and the NPS, and provide other support, guidance,
8 and resources to bargaining unit employees.

9 7. While I have been Local 3145’s President for the past four years and Council 270’s
10 President since January 2023, my Union work has dramatically increased over the past three
11 months. Since the end of January 2025, every day, I receive an incredible volume of questions
12 from members who are deeply concerned about their continued employment. After I finish work,
13 I spend many hours being a clearinghouse of information. I also connect employees with other
14 federal workers so they can communicate concerns with each other and understand all that has
15 been happening in the workplace since January 2025 or rumors they are hearing that could impact
16 their employment.

17 8. The Union first became aware of President Trump’s plan to conduct “large-scale”
18 Reductions in Force (“RIF”) through the February 11, 2025 Executive Order directed at all federal
19 agencies, including the Department of the Interior. No one from the Department of the Interior or
20 NPS had said anything about large-scale RIFs to the Union or employees like me before that
21 Order.

22 9. To date, I have not heard of any formal plans for a RIF at the Department of the
23 Interior or, specifically at NPS. I have read the Executive Order and the OMB/OPM memo, and
24 have very significant concerns about the impact on the Department, the NPS and me personally.
25 If the Department and NPS implement this Order in the “large-scale” manner directed by the
26 President, it will be devastating to the NPS.

27

28

1 10. The NPS is already very understaffed. Many budgeted FTEs are not filled. This
2 means positions that are allocated and needed to perform the services that the NPS is required to
3 perform, which are already not filled. Parks service employees such as myself are already doing
4 more with less than we should to accomplish the services the parks need. If I and my fellow
5 employees at Gettysburg are laid off, there will not be anyone to perform my important work of
6 preserve the landscape by mowing, doing the tree work, repairing park signs, maintaining park
7 trails, or performing other important maintenance tasks. The environment and the buildings at this
8 important park, which preserves a significant part of our country's history, will immediately start
9 to deteriorate. Also, visitors could be injured on trails or by trees that are not consistently and
10 properly maintained.

11 11. The abrupt terminations of the probationary employees provided a window into
12 how harmful it will be if even more employees are laid off and downsized. The impacts of those
13 firings, which were reversed by court order, were immediate and problematic. Services were
14 immediately cut, and the parks suffered. If large-scale RIFs are implemented, there will be no
15 possible way that the reduced staff for the same number of National Parks are able to protect and
16 preserve those parks.

17 12. If employees like myself who work in parks receive RIF notices, it will of course
18 impact the ability of the parks to stay open, with safe trails, and historical buildings properly
19 maintained. If rangers receive RIF notices, that will impact what ranger programs can continue to
20 be provided to visitors. Each park needs a superintendent to manage the park and provide support
21 to the employees at the park. With around 25% of the parks having a vacant superintendent
22 position and a blanket hiring freeze, it does not make any sense to lay off anyone when our
23 national parks are already understaffed from the top position to rank-and-file positions in the
24 Council's bargaining units. I do not know how the parks will be able to stay open and meet visitor
25 demands during the upcoming busy summer season.

26 13. Although the Department and the NPS have kept employees in the dark regarding
27 the Agency RIF and Reorganization Plan that was apparently submitted to the Office of

1 Management and Budget for review, I have heard rumors from other NPS employees that NPS
 2 plans to take Human Resources (“HR”) and Information Technology (“IT”) employees in NPS’s
 3 six regional offices, which are currently located in Philadelphia, Atlanta, Omaha, Denver, San
 4 Francisco, and Anchorage, and move those employees directly under the Department of the
 5 Interior, and relocate their positions to Washington, D.C. On April 18, 2025, I saw an online news
 6 article from Government Executive, dated April 9, 2025, that confirms these rumors, but adds that
 7 additional NPS Regional Office employees, such as in Communications, will also be impacted by
 8 the reorganization to the Department of Interior in Washington, D.C. A true and correct copy of
 9 Government Executive news article, which can also be found at
 10 [https://www.govexec.com/management/2025/04/interior-department-consolidate-functions-across-](https://www.govexec.com/management/2025/04/interior-department-consolidate-functions-across-country-leading-widespread-layoffs/404438/)
 11 [country-leading-widespread-layoffs/404438/](#), is attached hereto as Exhibit A.

12 14. Also, on April 18, I read an article in Greenwire, announcing that Interior
 13 Department Secretary Doug Burgum signed a Secretarial Order the previous day, on April 17, that
 14 confirmed these reorganization details and delegated all reorganization authority to DOGE official
 15 Tyler Hassen, who has been serving as Assistant Secretary – Policy, Management and Budget
 16 (“AS-PMB”) since March 10, 2025. A true and correct copy of the April 18 Greenwire article,
 17 which can also be found at [https://www.govexec.com/management/2025/04/interior-department-](https://www.govexec.com/management/2025/04/interior-department-consolidate-functions-across-country-leading-widespread-layoffs/404438/)
 18 [consolidate-functions-across-country-leading-widespread-layoffs/404438/](#), is attached hereto as
 19 Exhibit B. A true and correct copy of the secretarial order linked in the Greenwire article, which
 20 can also be found at [https://www.doi.gov/document-library/secretary-order/so-3429-consolidation-](https://www.doi.gov/document-library/secretary-order/so-3429-consolidation-unification-and-optimization-administrative)
 21 [unification-and-optimization-administrative](#), is attached hereto as Exhibit C.

22 15. The Secretarial Order, No. 3429, in Section 3 “Background”, references the
 23 February 11, 2025 Executive Order as the basis for the reorganization: “The [Interior] Department
 24 is committed to supporting President Trump’s Executive Order (EO) No. 14210, titled
 25 ‘Implementing the President’s ‘Department of Government Efficient’ Workforce Optimization
 26 Initiative,’ issued on February 11, 2025. As part of that commitment, the Department will be
 27 unifying and consolidating many of its function within the office of the Secretary. This will

1 include human resources, information technology, financial management, training and
2 development, international affairs, contracting, communications, Federal financial assistance, and
3 other administration functions.” Exhibit C, p. 1.

4 16. In Section 4, Secretary Burgum delegated his reorganization authority to the AS-
5 PMB: “The Assistant Secretary – Policy, Management and Budget (AS-PMB) is hereby assigned
6 to lead and coordinate the consolidation, unification and optimization efforts within the
7 Department and its Bureaus and Offices.” Exhibit C, p. 2.

8 17. On April 19, I saw an E&E News by Politico online article from March 10, 2025,
9 where a DOGE official Tyler Hassen has been named for the AS-PMB position. A true and
10 correct copy of the E&E News article, which can also be found at
11 <https://www.eenews.net/articles/doge-official-appointed-head-of-policy-at-interior/>, is attached
12 hereto as Exhibit D.

13 18. I also read an article in SFGate entitled “Elon Musk’s DOGE is now running
14 America’s national parks,” which was published on April 21, 2025. A true and correct copy of the
15 SFGate article, which can also be found at <https://www.sfgate.com/national-parks/article/doge-running-national-parks-20287023.php>, is attached hereto as Exhibit E. The article further
16 elaborates on the Secretarial Order: “The order grants broad powers to Hassen. It doesn’t require
17 Hassen to report to Burgum, or give Burgum veto power of any of Hassen’s decisions —
18 including the potential firing of thousands of public lands managers or park rangers.” Exhibit E.
19 The article also states that “as many as 100 superintendent positions had gone vacant” because of
20 vacant positions cannot “be filled due to a hiring freeze,” and others have resigned, taken a
21 voluntary buyout offer, retired early, or were fired. Exhibit E. Superintendents are the top
22 position in a park, and are responsible for managing all park operations, resources and employees.

23 19. Based on my understanding as a union official representing multiple locals and
24 bargaining units, and my understanding from reviewing these agency documents, this
25 Reorganization Plan would greatly impact the employees who remain by increasing their
26 workload. First, my understanding is that the point of consolidating these functions will be to
27

1 reduce the number of positions. Second, not all employees will want to relocate to Washington,
2 D.C. Reducing the number of employees in these regional offices will mean that the employees
3 who remain, and already have a large workload, will have even more work and it will take longer
4 for employees to receive their help. For example, for my park to hire seasonal workers to begin
5 working in the late spring/early summer, they need to be selected by my Park Manager by the
6 prior August, because the NPS HR paperwork process takes that long. This process will take even
7 longer if there are fewer trained HR employees. Also, right now the regional offices are generally
8 in the same time zone as the employees they work with at the parks. After relocation, the HR
9 personnel covering American Samoa National Park, which is seven hours behind Washington
10 D.C., are unlikely to overlap for more than one hour each workday. I have not heard if any
11 workers will remain in the Regional Offices.

12 20. The Local's and Council's members are very worried about the reorganization and
13 a large-scale RIFs that will occur in response to this Executive Order. The NPS workers at my
14 park come into work each day wondering if they will have a job tomorrow. With the abrupt firing
15 of all probationary employees in NPS that took place in February 2025, we do not know if we will
16 have our jobs by the end of the day each day. It is very stressful to be in a perpetual state of
17 uncertainty because we are not receiving any information about what the large-scale RIF means
18 for us. If the Department and NPS's reorganization plans were published in the Federal Register,
19 it would not only provide the Union and employees with concrete information about who may be
20 impacted, but the Union would also take the time to comment on the plans because they are
21 extremely important to our members. It is whether or not they will have a job.

22 21. When union members lose a federal job, it is about more than money. Federal
23 employees are supposed to have job security (in exchange for lower pay than the private sector)
24 and good benefits. When the probationary employees were abruptly fired, the clock immediately
25 began ticking on the expiration of those benefits. When federal workers lose their jobs and
26 benefits in the current economic environment, they and their families will suffer.

27

28

1 22. The Union's staff and activities are funded through members' voluntary dues, most
2 of which are paid through payroll deduction from their pay. If the Union no longer receives dues
3 from the members who chose not to relocate or are laid off in a large-scale RIF, that will make it
4 significantly more difficult for the Union to continue to function and to provide the services and
5 protection to bargaining units identified here. Currently I am spending many hours each day to
6 respond to all the member phone calls and emails with questions. This takes away from
7 performing my regular Union functions. A large-scale RIF will lead to even more questions and
8 requests for representation that will make doing my regular Union work nearly impossible.

I declare under penalty of perjury under the laws of the United States that the foregoing is
true and correct. Executed April 24, 2025, in Lexington, Kentucky.

Mark David Eckman

Mark Dietrich Cochran

Exhibit A

Government Executive

VA forces staff in workforce reduction discussions to sign non-disclosure agreements

By Eric Katz

April 24, 2025

The Veterans Affairs Department is requiring all employees working on its plans to slash tens of thousands of workers from its rolls to sign non-disclosure agreements, an unusual move that has prevented supervisors from sharing basic information with staff.

VA has begun holding meetings with representatives from across the department to discuss its workforce reduction plans after standing up a Reorganization Implementation Cell. Senior Executive Service and General Schedule-14 and 15 employees serving in those roles have signed NDAs, according to five employees briefed on the situation. *Government Executive* [first reported](#) that VA plans to cut its workforce down to fiscal 2019 levels, leading to cuts of around 80,000 employees.

Senior leaders throughout VA appear to be taking their NDAs seriously. In a recent meeting, a recording of which was obtained by *Government Executive*, Colleen Richardson, executive director of VA's Caregiver Support Program, told employees she had answers to their questions but could not disclose them.

Richardson said, for example, she could not disclose how many employees had signed up for the department's "deferred resignation program" that has enabled some staff to remain on paid leave until they separate from the agency by Sept. 30. Employees were eager to know the information as more people signing up will result in fewer employees being laid off.

"I want to just let people know a majority of senior leaders have been asked to sign non-disclosure agreements, NDAs," Richardson said. "I have been asked to sign an NDA so we are very, very limited on what information we can also share."

NDAs for issues such as personnel matters are highly unusual in government, where such agreements are typically limited to procurement-sensitive discussions and national security settings that include classified information. One senior human resources official in another part of government called the agreements "strange, technically unnecessary and redundant."

Federal employees already agree to not disclose deliberative matters to the public as part of their jobs and therefore the substance of the NDA is already implied and expected, that person said. The official speculated VA was seeking to limit what employees can say about those discussions in the event that they are themselves part of a reduction in force, as the NDA would likely extend beyond their termination.

VA did not respond to a request for comment.

Rep. Mark Takano, D-Calif., the top Democrat on the House Veterans Affairs Committee, said the NDAs could illegally circumvent whistleblower protection laws and encouraged employees to come forward to help lawmakers shed a light on the process.

"The use of NDAs in this context looks like a deliberate effort by the Trump administration to silence VA employees and block oversight," Takano said. "Secretary [Doug] Collins has failed to answer basic questions from Congress, and now his department is doubling down on secrecy."

Members of both parties have expressed apprehension about VA's large-scale workforce reduction plans.

One VA employee who has discussed the NDA-subjected meetings with attendees said the senior leaders "don't like" having to sign the agreements but "are being cautious not to create chaos."

"These are all really good, talented and caring leadership being thrown in the middle of this scuffle and are doing their best to protect us and our programs," the employee said. "I feel for them and know they are bruised and tired."

Another VA employee said a senior executive told 200 staff in a town hall that they were restricted by the NDA. The leadership team of that office has "been as open with us" as they can, but have offered up few details of the workforce reduction discussions. A third VA staffer briefed on the meetings found some comfort in, unlike some other agencies, the department involving career staff in the workforce meetings.

VA will review the suggestions from individual components in May and release its reorganization plan in June. RIFs will take place by September.

The discussions to date have focused on which positions VA will shed, according to one official familiar with them, though they have not yet begun contemplating which actual individuals will lose their jobs. The meetings have also involved the impacts of the hiring freeze and requests for [additional exemptions](#). The leadership teams are reacting constantly to updates from the top levels of the department as "the rules of the game seem to be changing by the day," the official said.

Another VA employee said the meetings have also honed in on reductions to the department's call centers. VA currently has [many call centers](#), including one at each of its regional offices for scheduling appointments. The most recent plan, the employee said, is to cut that down to two call centers: one for scheduling appointments and another for matters such as billing, pharmacy and community care. VA's 988 crisis line would also remain separate.

Richardson, the Caregiver Support Program executive, told employees she had to withhold details from them.

"There are certain things I cannot discuss even if I know them," she said. "My sincere apologies, but that's the truth behind it."

By Eric Katz

April 24, 2025

<https://www.govexec.com/workforce/2025/04/va-forces-staff-workforce-reduction-discussions-sign-non-disclosure-agreements/404808/>

Exhibit B

GREENWIRE

Burgum launches broad Interior reorganization

His order says the department will focus on its "core mission" and "will be unifying and consolidating many of its functions within the Office of the Secretary."



BY: SCOTT STREATNER | 04/18/2025 01:40 PM EDT



The Interior Department in Washington. | Getty

GREENWIRE | The Interior Department is moving forward with sweeping reorganization and consolidation efforts that will be overseen by a former member of the Elon Musk-led workforce reduction team.

Interior [began circulating basic outlines for the reorganization](#) last week, which a department official familiar with the plan said at the time would include consolidating communications, financial management, contracting, human resources, grants, civil rights and interactive technology. Another Interior official confirmed last week that the so-called Department of Government Efficiency, which has spearheaded President Donald Trump's cost-cutting efforts across the government, would lead the task.

Advertisement

Interior Secretary Doug Burgum [signed a secretarial order](#) Thursday that confirmed most of those details.

Under the subject line "Consolidation, Unification and Optimization of Administrative Functions," Burgum's order says Interior "will be unifying and consolidating many of its

E&E News article: Burgum launches broad Interior reorganization

functions within the Office of the Secretary.”

That consolidation, the order says, “will include human resources, information technology, financial management, training and development, international affairs, contracting, communications, Federal financial assistance, and other administrative functions. Further optimization will create significant efficiencies across the Department by improving processes, eliminating redundant efforts, and helping integrate technology adoption.”

Burgum’s order also assigns the task of overseeing the effort to Interior’s assistant secretary for policy, management and budget — the duties of which are currently being performed on an acting basis by Tyler Hassen, a former DOGE member who joined the department last month.

The secretarial order offers no details on when the reorganization and consolidation plan will be executed, how many employees might be involved and when it will be completed.

An Interior spokesperson issued an emailed statement saying the plan is part of broader efforts by the agency to implement “necessary reforms to ensure fiscal responsibility, operational efficiency and government accountability” that Trump has outlined.

The statement adds, “While we do not comment on personnel matters, we are collaborating closely with the Office of Personnel Management to embrace new opportunities for optimization and innovation.”

Hassen’s assistant secretary post will be responsible for developing “the appropriate prioritization, phasing, and steps required to achieve” the reorganization plan, according to the order. He’ll be tasked with making “appropriate funding decisions for the resulting consolidated administrative functions,” and for ensuring “the appropriate transfer of funds, programs, records, and property, as well as taking required personnel actions, to carry out the consolidation.”

Burgum’s order says the goal is to allow Interior to focus its efforts on meeting its “core mission,” which the secretary writes, “includes preserving more than 400 national parks and historic sites, delivering on our legal responsibility to 574 federally recognized Native American Tribes and entities, managing more than 500 million acres of U.S. land, conserving our Nation’s fish and wildlife, and offering emergency response and law enforcement capability across a broad and diverse geographic footprint.”

But a conservation watchdog accused Burgum of handing over too much power and control for the reorganization to Hassen and DOGE.

“If Doug Burgum doesn’t want this job, he should quit now,” said Jennifer Rokala, executive director of the Center for Western Priorities. “This order shows what it looks like when leaders abdicate their jobs and let unqualified outsiders fire thousands of civil servants who are working on behalf of all Americans and their public lands.”

Workforce tension

The secretarial order comes as [Interior employees are on edge](#) as they await expected departmentwide layoffs. The firings would kick off a process in which employees would compete against each other, jockeying for remaining positions using tenure, veterans’ preference, length of service and performance ratings.

Interior sent lists of specific competitive areas this week where staffers will compete for jobs, according to documents obtained by POLITICO’s E&E News. Among the areas listed: the Bureau of Ocean Energy Management’s Office of Renewable Energy, the Interior civil rights division in Denver, the Bureau of Land Management’s communications office at Interior headquarters, and a host of BLM state offices and directorates.

Interior has offered two rounds of deferred resignation and retirement to staffers; it’s not clear how many took the offer. The National Treasury Employees Union told members of its BLM headquarters chapter that 1,000 bureau staffers agreed to leave under that buyout program, according to an employee who attended.

It's expected the Trump administration won't move on mass layoffs at Interior until it determines how many employees voluntarily resigned or retired.

Burgum writes that the order signed Thursday is in response to Trump's [Feb. 11 executive order](#) that lays out a broad outline for implementing DOGE's governmentwide "Workforce Optimization Initiative."

Trump's order called for the White House Office of Management and Budget director to "submit a plan to reduce the size of the Federal Government's workforce through efficiency improvements and attrition." It also directed government agencies to "hire no more than one employee for every four employees that depart."

It also directed OMB within 30 days to develop "Agency Reorganization Plans," which among other things, should include an evaluation into whether an individual "agency or any of its subcomponents should be eliminated or consolidated." It exempted "military personnel" or any position an agency head deems "necessary to meet national security, homeland security, or public safety responsibilities."

Scott Streater can be reached on Signal at s_streater.8o.

Return to [Greenwire](#)



 YOUR ACCOUNT MANAGEMENT TEAM

Nick King

Associate Account Manager, Primary
nking@politico.com

Exhibit C



**THE SECRETARY OF THE INTERIOR
WASHINGTON**

ORDER NO. 3429

Subject: Consolidation, Unification and Optimization of Administrative Functions

Sec. 1. Purpose. The purpose of this Order is to authorize and direct the actions necessary to effectuate the consolidation, unification and optimization of administrative functions within the Department of the Interior (Department) in order to achieve effectiveness, accountability and cost savings for the American taxpayer.

Sec. 2. Authority. This Order is issued under the authority of sections 2 and 5 of Reorganization Plan No. 3 of 1950 (64 Stat 1262), as amended.

Sec. 3. Background. The Department is committed to supporting President Trump's Executive Order (EO) No. 14210, titled "Implementing the President's 'Department of Government Efficiency' Workforce Optimization Initiative," issued on February 11, 2025. As part of that commitment, the Department will be unifying and consolidating many of its functions within the Office of the Secretary. This will include human resources, information technology, financial management, training and development, international affairs, contracting, communications, Federal financial assistance, and other administrative functions. Further optimization will create significant efficiencies across the Department by improving processes, eliminating redundant efforts, and helping integrate technology adoption. This unification effort will accelerate technology advancements and enhance the Department's ability to deliver on our core mission, which includes preserving more than 400 national parks and historic sites, delivering on our legal responsibility to 574 federally recognized Native American Tribes and entities, managing more than 500 million acres of U.S. land, conserving our Nation's fish and wildlife, and offering emergency response and law enforcement capability across a broad and diverse geographic footprint.

Sec. 4. Interior Workforce Consolidation, Unification and Optimization. The Assistant Secretary – Policy, Management and Budget (AS-PMB) is hereby assigned to lead and coordinate the consolidation, unification and optimization efforts within the Department and its Bureaus and Offices.

Sec. 5. Responsibilities.

- a. **AS-PMB.** The AS-PMB is directed to take all necessary actions, including appropriate notifications, to effectuate the appropriate consolidation, unification and optimization of administrative functions within the Department and its Bureaus and Offices, including:

1. Determining the appropriate prioritization, phasing, and steps required to achieve the outlined above;
 2. Making appropriate funding decisions for the resulting consolidated administrative functions, including utilization of the Working Capital Fund to the maximum extent practicable;
 3. Issuing relevant policy, directives, and guidance, as well as overseeing necessary revisions to the Departmental Manual; and
 4. Ensuring the appropriate transfer of funds, programs, records, and property, as well as taking required personnel actions, to carry out the consolidation.
- b. **Assistant Secretaries and Bureau and Office Heads.** Assistant Secretaries and Bureau and Office heads are directed to, in coordination with the AS-PMB, take all necessary actions to carry out the orderly consolidation, unification and optimization of their relevant organizations and workforces to implement this Order, including making necessary revisions to the Departmental Manual resulting from the consolidation.

Sec. 6. **Delegation.** This Order delegates to the AS-PMB all authority necessary to carry out the plan directed herein. It also delegates any authority necessary to ensure the uninterrupted delivery of administrative functions during any period of transition required to complete the process.

Sec. 7. **Expiration Date.** This Order is effective immediately. It will remain in effect until the plan outlined above is completed and any resulting changes are incorporated into the Departmental Manual, or until it is amended, superseded, or revoked, whichever comes first.



David Bernhardt
Secretary of the Interior

Date: APR 17 2025

Exhibit D

GREENWIRE

DOGE official appointed head of policy at Interior

Tyler Hassen, previously identified as part of the DOGE team at Interior, was named to an acting assistant secretary role.



BY: HEATHER RICHARDS | 03/10/2025 01:45 PM EDT



The Interior Department headquarters in August 2023 in Washington. | Francis Chung/POLITICO

GREENWIRE | Tyler Hassen, a little-known figure with an oil and gas background helping spearhead the White House's larger cost-cutting efforts at the Interior Department, was quietly promoted Friday to acting assistant secretary of policy, management and budget.

The promotion of Hassen gives an official linked to the Elon Musk-driven Department of Government Efficiency a significant perch at the department as the Trump administration moves to further downsize.

Advertisement

POLITICO
New York Playbook

**The power player's guide
to Empire State politics**

SUBSCRIBE NOW

Interior declined to comment on the Hassen promotion, which was made public in a [secretarial order](#) signed by Interior Secretary Doug Burgum on Friday. The order

delegates the authorities of the assistant secretary for policy, management and budget to Hassen until May 31, unless extended. The Trump administration has not yet announced its nominee for the position, which must be confirmed by the Senate.

An official from Trump's first administration who worked on Interior issues said Hassen's new role shows that the White House wants to start using existing federal roles to implement their agenda rather than overrely on DOGE.

"It's the smarter path to follow," said the official, who was granted anonymity because they were not authorized to talk about the Trump administration's deliberations. "You don't want to get into these fights of who has authority and who doesn't. So, if you put somebody in there who has actual authority, that's no longer on the table."

President Donald Trump has suggested that DOGE's approach of making sweeping federal workforce cuts — which has included firing 2,300 Interior employees in their probationary periods and accepting the voluntary resignation of 2,700 Interior employees — will transition to more measured reductions.

"I don't want to see a big cut where a lot of good people are cut," Trump told reporters Thursday. "I want the Cabinet members to keep the good people, and the people who aren't doing a good job, who are unreliable, don't show up to work, et cetera, can be cut."

The comments came after the federal firings of probationary workers across the federal government were determined to likely be illegal by a federal judge and a federal labor oversight board.

Both a current and former Interior official identified [Hassen as part of the DOGE team at Interior](#). He also appeared in a photo published by the DOGE account on the social media platform X.

Hassen received his bachelor's degree from Princeton University in 2005 and began his career at Morgan Stanley, according to his [profile on LinkedIn](#).

Since 2008, he's worked for the New York-based Basin Holdings, which manufactures oil field equipment. He's held numerous posts in the company and its subsidiaries, including spending nearly eight years as the group's chief financial officer, president of Basin Power, CEO and chair of Wenzel Downhole Tools, chair of Basin Industries, and CEO of Basin Energy.

The assistant secretary of policy, management and budget doesn't usually attract much public attention compared to other Interior leadership positions. But it's a critical gearbox for the department, including overseeing the department's incoming revenues from energy development and helping lead a multiagency wildlife firefighting program, according to the Partnership for Public Service, a nonpartisan nonprofit that advocates for good government.

"The assistant secretary has responsibility for major operational components that support agency-wide functions, including the Interior Business Center, Office of Valuation Services, Office of Aviation Services, Natural Resource Damage Assessment program, Central Hazardous Materials Fund and the Payments in Lieu of Taxes program," the service said in a fact sheet.

An Interior fact sheet on the role says the assistant secretary "guides programs requiring Departmental attention due to their international or national concern, budgetary significance, legislative requirements, precedent-setting nature, or issues crossing bureau or office lines."

The role hasn't been filled with a Senate-confirmed position since the first Trump administration. Trump nominated Susan Combs for the seat. She served in an advisory role at Interior for 695 days before winning confirmation in 2019. She left the following year, and the role's authorities were delegated to another official until the end of the Trump administration.

Biden nominated Winnie Stachelberg for the post, but she faced heated opposition from Republican senators for her former advocacy in favor of gun control while an executive of the liberal Center for American Progress. The administration moved her into a position

overseeing implementation of the bipartisan infrastructure law, while Joan Mooney, an alum of the Obama-era, took on the delegated authority of the assistant secretary role for the remainder of Biden's term.

"The importance of the job has varied, but Burgum's early secretary orders put a huge amount of responsibility on the [assistant secretary for policy, management and budget role]," said a former Biden administration official, who was granted anonymity because they were not authorized to speak about the role. Burgum's orders aim to review and potentially roll back a suite of Biden-era rules and regulations that limit energy development.

Reporter Jennifer Yachnin contributed.

Heather Richards can be reached on Signal at h_richards.99.

UP NEXT IN THIS EDITION OF GREENWIRE

Interior suspends Biden-era legal opinions

BY MICHAEL DOYLE



 YOUR ACCOUNT MANAGEMENT TEAM

Nick King

Associate Account Manager, Primary
nking@politico.com

Exhibit E



Newsletters

[Sign in](#)**NATIONAL PARKS**

Elon Musk's DOGE is now running America's national parks

A major shakeup in leadership is underway at the National Park Service, which is now run by DOGE

By [Kylie Mohr](#), Big Sky Country Contributing Parks Editor

April 21, 2025



Interior Secretary Doug Burgum meets with Secretary of Health and Human Services Robert F. Kennedy Jr., Secretary of State Marco Rubio, President Donald Trump and Elon Musk in the Cabinet Room of the White House on April 10, 2025, in Washington,

D.C.
Brendan Smialowski/AFP/Getty Images

Listen Now: Elon Musk's DOGE is now running America's national parks

5:12 1x Everlit

A major shakeup in leadership is underway at the National Park Service.

[Watch More](#)

SFGATE

Late last week, Elon Musk's Department of Government Efficiency essentially took over the Interior Department, which includes the National Park Service, Bureau of Land Management, Bureau of Indian Affairs and more. The Interior Department is supposed to oversee 400 national parks and historic sites, uphold treaty rights with over 500 recognized Native American tribes, manage more than 500 million acres of land and conserve the country's fish and wildlife.

ADVERTISEMENT
Article continues below this ad

Interior Secretary Doug Burgum signed away significant control of the Interior Department in a secretarial order Thursday night. The order gives a DOGE operative, Tyler Hassen, the power to oversee the Interior Department for "consolidation, unification and optimization of administrative functions."

It directs Hassen, DOGE's assistant secretary of policy, management and budget, to make funding decisions, fire employees, create policy, oversee programs and transfer funds. Hassen is a former oil executive who worked for Basin Energy, an oil field equipment company, before joining the Trump administration.

The order grants broad powers to Hassen. It doesn't require Hassen to report to Burgum, or give Burgum veto power of any of Hassen's decisions — including the potential firing of thousands of public lands managers or park rangers. According to reporting in the Washington Post, Hassen is reviewing any grants and contracts worth more than \$50,000.



A National Park Service ranger conducts a walking tour in Shark Valley, part of the Everglades National Park, on April 17, 2025. Everglades National Park and all other national parks are now being run by Elon Musk's so-called Department of Governmental Efficiency.

Joe Raedle/Getty Images

It's unclear whether an agency leader can legally delegate authority to DOGE, a federal initiative that is not actually a government department established by Congress.

"This order shows what it looks like when leaders abdicate their jobs and let unqualified outsiders fire thousands of civil servants who are working on behalf of all Americans and their public lands," said Jennifer Rokala, executive director of Center for Western Priorities, a conservation advocacy organization, in a statement.

Efforts to consolidate the National Park Service have already been underway for months. Recent chaos at the National Park Service has led to crucial positions being lost and going unfilled, including top leaders at monuments and parks across the country. As many as 100 superintendent positions had gone vacant, according to Kati Schmidt, a spokesperson for the National Parks Conservation Association, a nonprofit dedicated to protecting national parks. The parks group has been a vocal opponent of the Trump administration's approach to the National Park Service, speaking out about policies it says will hurt the parks and those who visit them.

Park superintendents manage all operations, resources and employees in their park. They're also responsible for protecting the natural and cultural resources of their park or national monument.

The superintendent vacancies are due to a combination of factors: positions that were vacant before the Trump administration that now can't be filled due to a hiring freeze, people who resigned, people who took a voluntary buyout offer, people who retired early and people who were fired. Those who took early retirement offers had their last day on April 18.

ADVERTISEMENT

Article continues below this ad



Former Yosemite National Park Superintendent Cicely Muldoon poses for a portrait in Yosemite National Park on Tuesday, Oct. 25, 2022. Muldoon's position is one of at least 100 superintendent vacancies in the National Park Service.

Matt McClain/The Washington Post via Getty Images

Yosemite's superintendent, Cicely Muldoon, sent her resignation notice to staff a week before Donald Trump's inauguration. An acting superintendent is currently overseeing the park, but no one has been named as a replacement.

A presidential memorandum signed late last week won't help fill the important job vacancies across more than 400 national parks and historic sites, Schmidt said. President Trump extended his January hiring freeze through July 15.

"No Federal civilian position that is presently vacant may be filled, and no new position may be created, except as otherwise provided for in this memorandum or required by applicable law," it states.

ADVERTISEMENT

Article continues below this ad

"This will make things even more difficult for the NPS," Schmidt said in an email.

Former superintendents agreed with Schmidt's assessment. "The loss of upwards of 100 park superintendents (not to mention several regional directors) results in a significant loss of institutional knowledge within the National Park Service," Jeff Mow, the superintendent of Glacier National Park between 2013 and 2022, wrote in an email.

Mow said the loss of superintendents extends outside just the national park itself. "As the primary contact for their local communities, businesses that operate in the park, external partners and stakeholders, superintendents have to develop these relationships over time," Mow wrote in an email. "From my experience, trust is generally not readily transferable from one individual to another."

ADVERTISEMENT
Article continues below this ad

Vacant leadership positions are just the tip of the iceberg in jobs that are no longer getting done at the National Park Service under Trump. The National Parks Conservation Association is estimating that about 2,500 employees have resigned or taken early buyout offers, though final numbers are still being confirmed. That's on top of the approximately 1,000 employees who were fired on Valentine's Day, some of whom have gotten their jobs back — for now.

More National Parks

- [Trump admin declares emergency in California's federal forests](#)
- ['Much more difficult': Cuts leave famed Calif. trail in shambles](#)
- [National parks are in crisis. Should you visit or not?](#)
- [A rogue ranger is documenting every National Park Service firing](#)

We love national parks just as much as you do, so we have a newsletter that covers them from top to bottom. [Sign up here.](#)

April 21, 2025

Kylie Mohr

BIG SKY COUNTRY CONTRIBUTING PARKS EDITOR



Kylie Mohr is the Big Sky Country contributing parks editor at SFGATE, covering Glacier, Yellowstone and Grand Teton national parks from her home in Montana. She's an award-winning freelance journalist and correspondent for the magazine High Country News, where her work focuses on wildfire, wildlife and wild places in the West. Her bylines include the Atlantic, National Geographic, Outside, Vox, Business Insider, Grist and more. She's traipsed through the tundra banding snowy owls, climbed to the top of a 300-foot-tall tree and become a wildland firefighter for her stories. Send story tips or comments to kylie.mohr@sfgate.com.

Around The Web

Powered by REVCONTENT

Here's The Estimated Cost of a 1-day Gutter Guards Installation

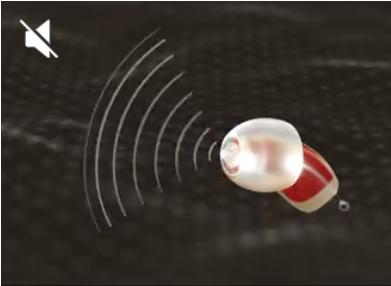
By LeafFilter Partner

Cardiologists: Forget Ozempic, 1/2 Cup Before Bed Burns Belly Fat Like Crazy!

By Health Headlines

Here's The Estimated Cost of a 1-day Walk-in Shower Upgrade

By HomeBuddy



Flight Attendant Reveals How to Fly Business Class for The Price of Economy

By Online Shopping Tools

Cardiologists: Here's How to Lose a Hanging Tummy Quickly, Try This Recipe!

By Health Headlines

Millions of Seniors Swear by These \$99 Hearing Aids

By Oricle Hearing

Neurologist: 97% of People With Neuropathy Don't Know This Crucial Thing

1 Easy Tip to Slash Your Electric Bill (Try Tonight)

By InstaSyncNexus

The New Flag- Wreath is Sweeping Washington

By Dotmalls